

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
<b>Plaintiff,</b>	)	
<b>vs.</b>	)	<b>INDICTMENT NOs.: 23CR00122-001</b>
	)	<b>23CR00169-006</b>
<b>LYTERIA HOLLIS,</b>	)	

**ADDENDUM TO  
HOLLIS'S POSITION WITH REGARD TO SENTENCING FACTORS**

COMES NOW the defendant, Lyteria Hollis, in the above-styled criminal case, by and through undersigned counsel, and files this addendum to her previously filed Position (Doc. 604) and states that the omission was an oversight and adds the following addendum with regard to the sentencing factors contained in the Presentence Investigation Report [Doc. 559].

1. As to ¶ 14, we object to the inaccurate reference, especially with respect to Ms. Hollis, that Mr. McCarroll and his coconspirators communicated extensively via text messages regarding the plot to murder Individual-1. The government referenced a text sent to Hollis on June 2, 2021 referencing, “send[ing] a flunky to kill a n\*\*ga.” The accurate account is that McCarroll sent a text message to Hollis asking if he should post a “particular meme”. See attached; government exhibit (GX 98H, pp54-55). All of the text references, involving Ms. Hollis, about communicating extensively regarding a plot to murder Individual-1, are assumptions and occurred over a year prior to any plot that was discussed on 09-18-2022, as testified to by Fluker.

**COMPLIANCE WITH STANDING ORDER**

This objection was not communicated to A.U.S.A., Justin Roller, or U.S.P.O., Kelli Cleveland, because it was an oversight. I expect the government to disagree with this position.

/s/ LaWanda J. O'Bannon \_\_\_\_\_

LAWANDA JEAN O'BANNON

**CERTIFICATE OF SERVICE**

I hereby certify that the within and foregoing pleading will be served upon all parties by ECF notification by the Clerk of Court on this the 1<sup>st</sup> day of April, 2025.

/s/ LaWanda J. O'Bannon